

**SPG 2190.1 Basic  
September 20, 2002**

**John C. Stennis Space Center  
Export Control Program  
Procedures and Guidelines**



National Aeronautics and  
Space Administration

**John C. Stennis Space Center**  
Stennis Space Center, MS 39529-6000

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page ii of vi		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## Document History Log

Status/Change/ Revision	Change Date	Originator/Phone	Description
Basic	August 2002	Vince Andres x8-3931	Initial Release

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page iii of vi		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## Table of Contents

<b>PREFACE</b> .....	v
P.1    PURPOSE .....	v
P.2    APPLICABILITY .....	v
P.3    AUTHORITY .....	v
P.4    REFERENCES .....	v
P.5    CANCELLATION.....	vi
<b>CHAPTER 1. INTRODUCTION AND DEFINITIONS</b> .....	1
1.1    Introduction.....	1
1.2    Definitions.....	1
<b>CHAPTER 2. RESPONSIBILITIES</b> .....	6
2.1    Center Export Administrator (CEA).....	6
2.2    Center Export Counsel (CEC) .....	7
2.3    Center Program/Project/Directorate/Department/Office Managers .....	8
2.4    Center Scientific and Technical Information (STI) Officer.....	8
2.5    Center Technology Transfer Officer (TTO) .....	9
2.6    Center Transportation Officer (CTO) .....	9
2.7    Chief Information Officer (CIO) .....	9
2.8    Export Control Auditor (ECA) .....	10
2.9    Exporter/Author .....	10
2.10   Software Release Authority .....	10
<b>CHAPTER 3. PROCEDURE</b> .....	11
3.1    Planning .....	11
3.1.1   Export Processing Template .....	11
3.2    Operations .....	13
3.2.1   Software .....	13
3.2.2   Foreign Visitors/Workers.....	14
3.2.3   Scientific & Technical Information .....	14
3.2.3.1   NASA Scientific and Technical Document Availability Authorization (DAA) ..	15
3.2.3.2   Document Availability Authorization (DAA) Process .....	15
3.2.4   Shipping .....	16
3.2.5   Export via U.S. Mail, Fax, E-mail, Hand-carry, or Foreign Travel.....	17
3.2.6   Internet/Web Page.....	18
3.3    Training.....	18
3.4    Foreign Travel.....	19
3.4.1   Trips Abroad .....	19
3.4.2   Travel Tips .....	19

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page iv of vi		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

<b>CHAPTER 4. ACTIVITIES PROCESS INFORMATION .....</b>	<b>21</b>
4.1 Planning Activities Process.....	21
4.2 Document Availability Authorization (DAA) NF 1676 .....	22
4.3 Shipping Hardware .....	23
<b>CHAPTER 5. RECORDS .....</b>	<b>24</b>
5.1 Export Records.....	24
5.2 Examples of Records Retained .....	25

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page v of vi		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## PREFACE

### P.1 PURPOSE

The John C. Stennis (SSC) Export Control Program Procedures and Guidelines (SPG) document establishes a process for implementation of NPD 2190.1, *NASA Export Control Program*.

This instruction provides guidelines and standards for processing technology and hardware intended for export.

### P.2 APPLICABILITY

The instruction applies to NASA/SSC and NASA contractor organizations that send or transmit hardware, software, technology, or technical information to destinations outside the United States, or to a foreign person or entity within the United States.

### P.3 AUTHORITY

- a. 42 U.S.C. 2473 (c)(1) of the National Aeronautics and Space Act of 1958, as amended.
- b. NPD 2190.1, *NASA Export Control Program*.

### P.4 REFERENCES

All references are assumed to be the latest version unless otherwise specified

- a. NPD 2210.1, *External Release of NASA Software*.
- b. NPD 2220.5, *Management of NASA Scientific and Technical Information (STI)*.
- c. NPD 2800.1, *Managing Information Technology*.
- d. NPD 9710.1, *Delegation of Authority - To Authorize or Approve Temporary Duty Travel on Official Business and Related Matters*.
- e. NPG 1371.2, *Procedures and Guidelines for Processing Requests for Access to NASA by Foreign Nationals or Representatives*.
- f. NPG 1441.1, *NASA Records Retention Schedule*.
- g. NPG 2210.1, *External Release of NASA Software*.
- h. NPG 2200.2, *Guidelines for Documentation, Approval, and Dissemination of NASA Scientific and Technical Information*.
- i. NPG 2800.1, *Managing Information Technology*.
- j. NPG 2810.1, *Security of Information Technology*.
- k. 27 CFR, Parts 1-199, *Alcohol, Tobacco & Firearms, (ATF)*.
- l. 15 CFR, Parts 730-774, *Export Administration Regulations, (EAR)*.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page vi of vi		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

- m. 31 CFR, Parts 500-598, *Foreign Assets Treasury Control, (FATC)*.
- n. 22 CFR, Parts 120-130, *International Traffic in Arms Regulations, (ITAR)*.
- o. 10 CFR, Part 110, *Nuclear Regulatory Commission Regulations, (NRC)*.

## **P.5 CANCELLATION**

None

### **Original Signed By**

William W. Parsons  
Director

### **DISTRIBUTION**

SDL 5  
NODIS

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 1 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## CHAPTER 1. INTRODUCTION AND DEFINITIONS

### 1.1 Introduction

Stennis Space Center is responsible for NASA's rocket propulsion testing and for partnering with industry to develop and implement remote sensing technology. These responsibilities require all NASA and NASA Contractor personnel to be knowledgeable in the appropriate methods of exporting technical information, hardware, and software. This instruction is designed to assist NASA personnel in this process.

### 1.2 Definitions

**Bureau of Industry and Security (BIS):** Formerly the Bureau of Export Administration. This bureau, under the Department of Commerce, is responsible for administering the laws relating to the control of certain exports and related activities. This effort is accomplished through the publication and administration of the Export Administration Regulations (EAR) 15 CFR Parts 730-774.

**Central Shipping & Receiving:** The responsible organization at SSC that ensures that all exports and transfers of commodities, technologies, and software that require transportation services, are accompanied by appropriate export control documentation.

**Commerce Control List (CCL):** The CCL is a list of items under the export control jurisdiction of the Bureau of Industry and Security (BIS), U.S. Department of Commerce. Note that certain additional items described in part 732 of the EAR are also subject to the regulations. The CCL is found in Supplement No. 1 to part 774 of the EAR.

**Commodity:** Any article, material, or supply except technology and software.

**DD Form 1149, *Requisition and Invoice/Shipping Document*:** This form is used to ship property from one location to another. This form is available at the SSC Shipping and Receiving Office. This form is not an electronic form.

**Deemed Export:** An export of technology or source code (except encryption source code) is "deemed" to take place when it is released to a foreign national within the United States. See Section 734.2(b)(2)(ii) of the Export Administration Regulations (EAR).

**Denied Persons List:** A list, referenced in Supplement No. 2 to part 764 of the EAR, of specific persons that have been denied export privileges, in whole or in part. The full text of each order denying export privileges is published in the Federal Register.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 2 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## Export:

- a. Any shipment, transfer, or transmission of commodities, technology, or software out of the United States.
- b. Any transfer to any person, either within or outside of the United States, of commodities, technology, or software, by physical, electronic, oral, or visual means, with the knowledge or intent that the items will be shipped, transferred, or transmitted outside of the United States.
- c. Disclosure of technical data to a foreign national by physical, electronic, oral, or visual means, within or outside of the United States (disclosures to U.S. nationals representing foreign interests are not exports unless there is knowledge or reason to know that the technical data will be further disclosed to a foreign party).
- d. Any transfer to a foreign embassy or affiliate.
- e. Any transfer of control over a satellite or instruments on-orbit.

**Export Control Classification Number (ECCN):** The numbers used in Supplement No. 1 to part 774 of the EAR to identify items subject to the regulations. The Export Control Classification Number consists of an integrated set of four digits and a letter. Refer to Section 738.2 of the EAR for a complete description of each ECCN's composition.

**Export Processing Template:** The NASA Export Processing Template (EPT) is to be used in conjunction with current U.S. Export Regulations (15CFR Parts 730-774) and U.S. International Traffic in Arms Regulations (22CFR Parts 120-130). The EPT is available on the SSC Intranet under "Reference Documentation," "SSC Export Control Program."

**Exporter:** The person or organization responsible for the transfer of an exported item, in accordance with the SSC export control program, NASA, or other federal agency rules or regulations.

**Foreign Person:** All persons or entities not included in the definition of a U.S. person.

**License:** A document approved by the U.S. Government allowing for the export of specified goods or technical data to a specified foreign party for a specified purpose.

**License Exception:** An authorization described in part 740 of the Export Administration Regulations (EAR) that allows you to export or re-export, under stated conditions, items subject to the EAR that otherwise would require a license. Unless otherwise indicated, these license exceptions are not applicable to exports under the licensing jurisdiction of agencies other than the Department of Commerce.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	Number	Rev.
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 3 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

**License Exemption:** Authority granted by the International Traffic in Arms Regulations (ITAR) allowing the export of certain commodities, technologies, software, and/or technical data without obtaining export licenses. These exemptions are applicable only to those items under the jurisdiction of the Department of State.

**SSC Form SSC-707, *SSC Web Site Registration*:** This form is used to register a request to establish a SSC web site. This form is an electronic form.

**NF 1167, *Request for Approval of Foreign Training and Non Program Travel or Participation in Domestic Outside Symposia*:** This is a finance office form that must be approved at the management and Headquarters level, Code ID. A copy of the NF 1676 should accompany this form. This is an electronic form.

**NF 1676, *NASA Scientific and Technical Document Availability Authorization*:** Prior to export of scientific and technical information or hardware subject to export laws, regulations, and equipment shall be completed and processed for technical review and conformance with applicable law, policy, patent and copyright determination, publication standards, distribution and classification determination. This form complies with NPG 2200.2, *Guidelines for Documentation, Approval, and Dissemination of NASA STI*. This is an electronic form.

**NF 892, *Property Pass Request and Removal Permit*:** This permit authorizes the removal of Government property from Stennis Space Center. Government property in the category of general office equipment being exported as tools of trade on Government business for 30 days or less may be accounted for by using NF 892. If the hand-carried item was manufactured in a country other than the U.S., the Customs Office recommends that the traveler "register" the item to expedite the process and prevent the assessment of import duties upon return to the U.S. This may be done by completing a Certificate of Registration (CF4457), taking the equipment and form to a local Customs Office prior to travel departure.

**Proscribed Countries (ITAR Section 126.1):** Prohibited exports and sales to certain countries. It is the policy of the U.S. to deny licenses, other approvals, exports and imports of defense articles and defense services, destined for or originating in certain countries. A comprehensive listing is published by the State Department in the Federal Register. A listing is also available on the NASA export control Web site under the ITAR link.

**Publication Numbering Series (PNS):** A Stennis number assigned to the export on NF 1676. The electronic numbering process is available on the Stennis internal web page under the category "How To," PNS.

**Scientific and Technical Information Office (STI):** The STI office assists in the publication of NASA sponsored research and development and related efforts disseminated through suitable non NASA scientific and technical channels in addition to being included in appropriate NASA

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 4 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

STI report series described in NPG 2200.2, *Guidelines for Documentation, Approval, and Dissemination*.

**Software:** A collection of one or more "programs" or "micro programs" fixed in any tangible medium of expression, like code or firmware.

**Schedule B Numbers:** The commodity numbers appearing in the current edition of the Bureau of the Census publication, Schedule B statistical classification of domestic and foreign commodities exported from the United States. These numbers identify all items exported from the United States and are used by the Bureau of the Census to determine the balance of trade statistics. The Schedule B numbers are available on <http://www.census.gov/foreign-trade/schedules/b/index.html>.

**Shipper's Export Declaration (SED):** A form (Bureau of the Census Form 7525-V) that is required to accompany many export shipments, including hand carries. The SED declares the existence of an export license or authorization under a license exception or exemption provision. The SED identifies the item being shipped and declares its value. The Bureau of the Census requires this information for generating the balance of trade statistics (EAR - Forms Supp).

**Specially Designated Nationals:** A listing issued by the U.S. Department of Treasury of parties who act on behalf of countries against which the U.S. has placed sanctions. U.S. parties are forbidden by law from transacting business with such parties (EAR Part 764 Supp No. 3).

**Statutory Debarment:** A listing issued by the U.S. Department of State of parties who have been denied export privileges as a result of violating export laws. The law forbids exporters from entering into export transactions with such parties (ITAR Part 126).

**Table of Denial Orders:** A listing issued by the U.S. Department of Commerce of parties who have been denied export privileges as a result of violating export laws. The law forbids exporters from entering into export transactions with such parties (EAR Part 764 Supp No. 2).

**Technical Data:** Information of any kind that can be used, or adapted for use, in the design, production, manufacture, repair, overhaul, processing, engineering, development, operation, maintenance, use or reconstruction of articles or materials. Forms of technical data include blueprints, drawings, specifications, plans, instructions, documentation, operating and maintenance manuals, factory tours, oral discussions, training programs and software. Information, which provides only a description of a commodity, its general characteristics and expected performance does not constitute technical data.

**Technology:** Specific information necessary for the development, production, or use of a product. The information regarding the product takes the form of technical data or technical assistance.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 5 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

**The United States Munitions List (ITAR Section 121.1):** Articles, services and related technical data are designated as defense articles and defense services pursuant to sections 38 and 47(7) of the Arms Export Control Act (22 U.S.C. 2778 and 2794(7)). The articles are enumerated as categories in the ITAR, i.e. Category I through XXI.

**Transfer:** Any method of exporting. This can be mail, fax, e-mail, worldwide web (www), shipping, hand-carry, telephone, or face-to-face discussion, etc.

**US Customs Form 4457, *Certificate of Registration*:** The U.S. Customs Office uses this form. When traveling internationally, travelers are encouraged to register property/equipment prior to their departure at the Port of Exit. This form is available at the local area Customs Office. It is not an electronic form.

**U.S. Person:** Any person who is lawful permanent resident or U.S. national as defined in 8 U.S.C. 1101(a)(20) or who is protected individual as defined by 8 U.S.C. 1324 b (a)(3). It also means any corporation, business association, partnership, society, trust, or any other entity, organization, or group that is incorporated to do business in the U.S. It also includes any governmental (federal, state, or local) entity.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 6 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## CHAPTER 2. RESPONSIBILITIES

### 2.1 Center Export Administrator (CEA)

The CEA will:

- a. Serve as the Center resident authority on matters related to export control and international technology transfer, and the principal Center point-of-contact with the Headquarters Export Administrator (HEA);
- b. Maintain a knowledge of current NASA NPD/NPG, EAR and ITAR provisions and requirements applicable to Center programs and activities, and assist in developing Center policy and procedures as appropriate;
- c. Ensure the completion and maintenance (record keeping) of necessary licensing and/or exemption/exception documents regarding specific transfers pursuant to Center programs subject to the EAR and ITAR (completion of export control documents are accomplished by authors and project offices);
- d. Provide support in the Center process for approving foreign visitors and hires, providing advice and guidance to the Center International Visit Coordinator, and to SSC personnel, who serve as sponsors for such visitors and hires, providing assistance in the development of appropriate security plans/technology transfer control plans;
- e. Assist program and project personnel in determining the appropriate export controls for publishing and disseminating scientific and technical information under the policy set forth in NPD 2220.5, *Management of NASA Scientific and Technical Information (STI)* and NPG 2200.2, *Guidelines for Documentation, Approval, and Dissemination of NASA Scientific and Technical Information*;
- f. Assist Center Contracting Officers and Contracting Officer Technical Representatives in procurement related matters involving export control; e.g., providing guidance on entering into contracts with foreign entities, responding to contractor questions/requests, drafting of EAR license exceptions or ITAR exemptions for use by the contractor, and drafting of appropriate clauses in NASA solicitations;
- g. Assist the Chief Information Officer (CIO) in effecting local policy on placing information on NASA Web sites;
- h. Assist the Center Software Release Authority in making determinations as to export control restrictions per NPD/NPG 2210.1, *External Release of NASA Software*;

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 7 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

- i. Coordinate with Center Export Counsel, Transportation Officers, and Project Managers on export control matters affecting Center programs and activities. Advise Center Transportation Officer on questions related to international shipments (including foreign imports of commodities). Where the CEA, in consultation with these officials, determines that a proposed export or transfer would not be in conformity with NASA policy, the EAR or the ITAR, he/she shall have the authority to suspend such activity pending resolution with the concerned offices or agencies;
- j. Establish a Center training plan for responsible Center export control program personnel and arrange for or provide training;
- k. Review locally and consult with the HEA on all Center commodity jurisdiction, classification and licensing requests for Center projects and after local approval route to the HEA for formal transmittal to and processing by BIS or Office of Defense Trade Controls (ODTC);
- l. Serve as the interface with the HEA for review and comment of all contractor requested EAR and ITAR license applications related to Center programs;
- m. Serve as the interface with the HEA for review and comment on all Committee on Foreign Investment in the United States (CFIUS) cases related to Center programs;
- n. Serve as the Center export control point-of-contact for General Accounting Office (GAO) and Inspector General (IG) audits related to export control matters;
- o. Assure an annual audit of the export function is performed (auditor will be appointed by the Director, Center Operations and Support Directorate). Assure Center follow-up and close-out on recommendations from the annual audit, and as appropriate, on GAO and IG audits related to export control;
- p. Periodically disseminate export control information to appropriate Center personnel;
- q. Establish contacts with Center contractors involved in Center programs with international content to share information and to work issues related to licenses and/or granting or use of NASA authorized EAR license exceptions or ITAR exemptions; and
- r. Maintain a reference library of relevant policies and regulations.

## 2.2 Center Export Counsel (CEC)

The Center Export Counsel will:

- a. Assist the CEA in reviewing specific exports and transfers under NASA programs, as appropriate; and

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 8 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

b. In collaboration with the CEA, inform the export control personnel of statutory and regulatory developments in the U.S. export control system.

### **2.3 Center Program/Project/Directorate/Department/Office Managers**

All SSC Program/Project/Directorate/Department/Office Managers will, in consultation with the CEA, ensure that:

- a. Transfers are consistent with NASA Headquarters Program Office policy to ensure that export control matters are considered and resolved in advance of prospective shipping or transfer dates;
- b. Appropriate safeguards are implemented for commodities, Web pages, technologies, and software pursuant to international agreements;
- c. All commodities, Web pages, technologies, and software exported or transferred are done in accordance with the SPG 2190.1, NASA, and other federal agency rules or regulations;
- d. The CEA is provided with any appropriate technical information or assistance to permit a sound determination as to the need for export licenses or other export related documentation in specific activities, and for the completion of such documentation, where necessary;
- e. Appropriate and applicable forms are reviewed and signed in accordance with policy and procedure; and
- f. Required export control documentation is developed.

### **2.4 Center Scientific and Technical Information (STI) Officer**

The Center STI Officer will:

- a. Sign as the Document Availability Authorization Authority;
- b. Provide guidance to all organizations relating to the release of scientific and technical information and the completion of NF 1676;
- c. Receive, review, and process all DAA forms originated by NASA personnel and from NASA contractor personnel, as required by the contract, grant or cooperative agreement;
- d. Ensure a document number is assigned using the Publication Numbering Series (PNS) available on the Stennis Intranet under "How To;"

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 9 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

- e. Identify appropriate NASA Program/Project Officer or Technical Monitor on contractor papers; and
- f. Ensure that approved DAA forms are properly maintained in support of formal audits of the export function.

## **2.5 Center Technology Transfer Officer (TTO)**

The SSC Office of Technology Transfer will:

- a. Review and concur on DAA (NF 1676) requests submitted by authors as pertains to technology transfers, patent and copyright information; and
- b. Review and concur as the Software Release Authority for the external release of NASA software in accordance with NPD 2210.1, *External Release of NASA Software*.

## **2.6 Center Transportation Officer (CTO)**

The SSC Transportation Officer will:

- a. Ensure, in consultation with the CEA, that all exports and transfers of commodities, technologies, and software, requiring transportation services, are accompanied by the appropriate and accurate export control documentation, including licenses, Property Pass Request & Removal Permit, Schedule B Commodity Codes, Foreign Consignee Statements, Shipper's Export Declarations (SEDs) or other authorizing documents and marking, as needed. The SSC Transportation Officer is authorized to sign SEDs but is not authorized to sign export license documents. The CTO is responsible for the organization that provides transportation services for the physical export or transfer of hardware items. Information on the above requirements can be located on the NASA export administration Web site.
- b. Ensure the SSC Travel Services Office (Contractor) provides a copy of all NASA and NASA contractor foreign travel itineraries (official business) to the CEA and the SSC CTO.

## **2.7 Chief Information Officer (CIO)**

The SSC Chief Information Officer will be responsible for all Information Technology (IT) policies, standards, and procedures as well as IT security. The CIO will work in consort with the ECP and IT security to establish a process for appropriate releases of information.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 10 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## 2.8 Export Control Auditor (ECA)

The Export Control Auditor (ECA) will:

Prepare an audit report to the Director, Center Operations and Support Directorate that includes a description of the review process undertaken, the findings, and any recommendations or suggestions. A copy of the report will be provided the CEA and CEC.

## 2.9 Exporter/Author

The Exporter/Author will:

- a. Be familiar with the Agency's export control program;
- b. Review the SSC Intranet Web site. The SSC Export Control Program is located under the "Reference Documentation" section;
- c. Use the export control template to assess the item or document to be released;
- d. Prepare necessary export related documentation;
- e. As appropriate, consult with the appropriate Program/Project Officer; CEA; CEC; TTO; Software Release Authority; or STI Officer; and
- f. Assure the proper completion, numbering, and processing of NF 1676 and other required forms in accordance with Agency and Center export policy guidelines.

## 2.10 Software Release Authority

The Software Release Authority will:

- a. Assure that the external release of NASA software is accomplished in accordance with NPD 2210.1, *External Release of NASA Software*;
- b. Use the export control template to assess the item or document to be released; and
- c. Prepare necessary export related documentation.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 11 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## CHAPTER 3. PROCEDURE

The SSC Export Control Program (ECP) is an integrated process consisting of (1) planning, (2) operating, (3) training, and (4) record keeping. The ECP process is designed to fulfill the SSC mission for cooperative international research and civil space development in compliance with the export control laws and regulations of NASA and the United States.

### 3.1 Planning

The planning function includes activities associated with the education of program, project, department, and office managers on the need to address the issues and impact of export control regulations, and the development of timely export control plans (preferably in their program/project plan). Planning also includes the continuous assessment of export technologies for applicability of export control regulations. The export control program process shall, as appropriate, be included in any Center and SSC Work Instructions. A process activities description of the planning function is depicted in paragraph 4.1.

#### 3.1.1 Export Processing Template

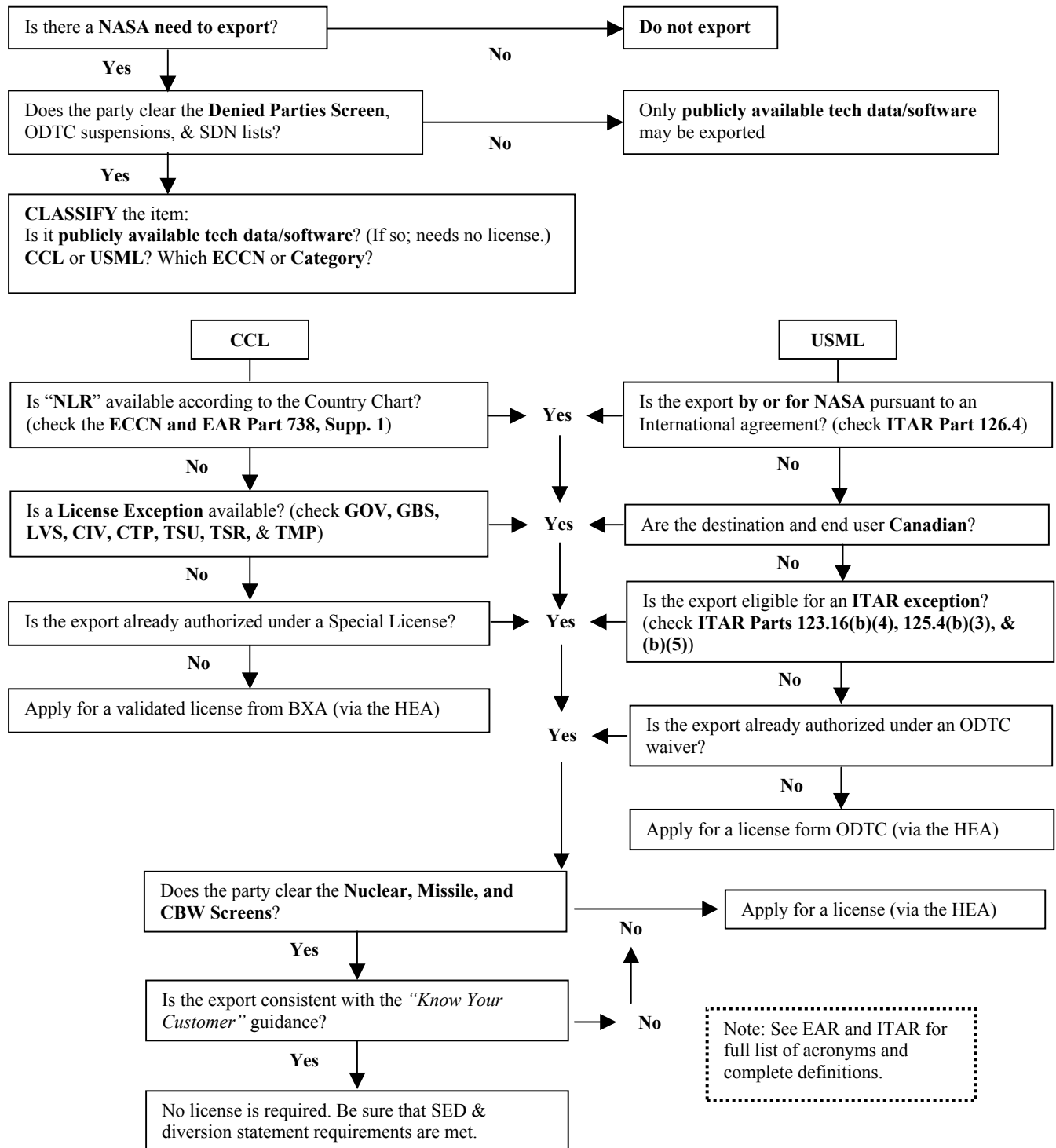
During the planning process, program/project/department/office managers should utilize the Export Processing Template (EPT) in determining the applicability of export control process in their program. The template shown below is also available electronically on the SSC Intranet under "Reference Documentation," "Export Control Program." Complete instructions on using the template are on the Web page.

Examples of the types of questions that must be answered are:

- a. Does the EAR or ITAR apply? To determine this, use the export control template.
- b. Does NASA have an International Agreement or Memorandum of Agreement covering the transfer?
- c. What is the product classification(s) under the EAR or ITAR category classification?
- d. Will an export license required?
- e. Can an EAR exception or ITAR exemption be used?
- f. Is a letter of assurance required?

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	Number	Rev.
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 12 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## Export Processing Template Flowchart



Note: See EAR and ITAR for full list of acronyms and complete definitions.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		
		Page 13 of 25

## 3.2 Operations

Subject to NASA and U.S. Government laws and regulations, the SSC day-to-day operations function consists of the activities associated with: the identification and classification of export commodities, technical data, and software; cataloging and archiving of export control data and records; and evaluations to assure the development of proper export controls and/or Center positions. SSC export control encompasses software, foreign visitors/workers, scientific and technical information (STI), shipping transportation, US Mail, fax, e-mail, hand-carry, foreign travel and internet web page.

### 3.2.1 Software

This section defines the export related activities associated with the software release process at SSC.

a. The requestor and the program/project manager review the software release request for export control considerations using the Export Processing Template (EPT) available on the SSC Intranet under "Reference Documentation," "Export Control Program." The requestor completes the NF 1676. The concurrence criteria includes the following concerns:

1. Does the EAR or the ITAR control the software?
2. Where will the software be sent?
3. Is the transfer part of an International Agreement, contract, grant, or cooperative agreement?
4. Is the software identified as a critical technology?
5. Who will receive the software?
6. Was the export template utilized for additional guidance?

b. The Software Release Authority determines if there are export issues with the release of the software.

c. The requestor consults with the CEA for assistance in review, if necessary.

d. If the CEA does not concur with the request, he/she advises the Software Release Authority of the disapproval. The CEA makes a copy of the material and places it in the record of export activity.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 14 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

### 3.2.2 Foreign Visitors/Workers

This section defines the export activities associated with the Foreign Visitors/Workers process at SSC. A Foreign Visitors/Workers process is defined in NPG 1371.2, *Procedures and Guidelines for Processing Requests for Access to NASA by Foreign Nationals or Representatives*.

- a. The concurrence criteria includes the following concerns:
  1. Did the sponsor/host submit a "Request for Request" for a foreign visit to SSC? (The electronic request form is located on the web at <https://ivan.esportals.com/login.cfm>.)
  2. Is sponsor/host aware of their export control responsibilities?
  3. Is individual on the denied parties list or the specially designated nationals list? (EAR Part 764 Supplements 2 & 3)
  4. Is individual from a proscribed country? (ITAR Part 126-1)
  5. What areas of Stennis are to be visited?
  6. Is an international agreement involved with the visit?
  7. Is a Technical Assistance Agreement necessary with the visit?
  8. What specific technologies will the foreign national be exposed to?
  9. What are the names or numbers of the projects, contracts, or grants?
  10. What is the field of research?
  11. Is this considered fundamental research, which is ordinarily published and shared broadly within the scientific community?
  12. Will a license be required for the foreign national?
- b. The sponsor/host determines if there are any export issues with the visit and is responsible for completing all form requests. The sponsor may consult with the CEA.

### 3.2.3 Scientific & Technical Information

An important responsibility of the originator/author is to review any material planned for publication so that it conforms to the NASA procedures and guidelines set out in NPG 2200.2, *Guidelines for Documentation, Approval, and Dissemination of NASA Scientific and Technical*

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 15 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

*Information.* This is necessary for all presentations of scientific and technical information for conferences and publications in scientific journals, periodicals, books, and electronic media.

Generally, information published or presented to an open audience must be “publicly available” or qualify as fundamental research. Fundamental research is characterized by the results being made freely available and is defined in section 734.8 of the EAR and in paragraph 120.11 of the ITAR.

It is important to determine if the information falls under the jurisdiction of the EAR or the ITAR and if the author requires a license prior to release of the information/equipment/software to a foreign person. If a license is required, it will take up to six months to receive the license.

All space launch vehicles and satellites, with the exception of Space Station, fall under the jurisdiction of the ITAR, therefore most releases dealing with these subjects will require the application of the more stringent criteria defined in section 120.11 of the ITAR.

If an author claims that information is in the public domain, then the author shall be prepared upon request to provide supporting evidence to satisfy the requirements of the export regulations.

If the author plans to publish information or data originated by another company, permission to release that information should be obtained from that company prior to publication.

### **3.2.3.1 NASA Scientific and Technical Document Availability Authorization (DAA)**

The *NASA Scientific and Technical Document Availability Authorization* (NF 1676) form is used by the SSC export program in conjunction with the Stennis STI program to convey information about planned exports or publications. It covers exports through international shipping, U.S. mail, fax, e-mail, or Internet transfer of all commodities, technology, software, and technical data. If hardware is to be shipped, NF 1676 is used in addition to the DD Form 1149, *Requisition and Invoice/Shipping Document* and other required forms.

All exporters should complete NF 1676 prior to proceeding with any transfer to a foreign entity. The CEA should be consulted if there are any questions in the preparation of the form. It is important that the information be as accurate as possible to assist personnel in determining the specific export regulations that apply and the requirements for transfer. The NF 1676 is an internal document and not released outside the agency unless authorized by the STI office.

### **3.2.3.2 Document Availability Authorization (DAA) Process**

This section defines the export activities associated with the Document Availability Authorization process at SSC. The DAA activity description depicting the processes is defined in paragraph 4.2.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 16 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

- a. The author/originator prepares NF 1676 and obtains the Department Manager's approval.
- b. If the project manager or supervisor concurs with the request, the author/originator sends the request to the TTO for review and concurrence. The TTO concurs/non-concurs and forwards it to the CEA who signs block VIII of NF 1676. The CEA returns a copy of the NF 1676 and the original attachment. The CEA places the original NF 1676 and a copy of the attachment in his/her record of export activity.

### 3.2.4 Shipping

This section defines the export activities associated with the shipping process at SSC. A shipping activity description depicting the processes is defined in paragraph 4.3.

- a. The exporter determines the need for the export as part of his/her NASA/SSC official responsibilities, plans and schedules its occurrence. Exporter prepares NF 1676 and attaches a copy of shipping information and, if applicable, travel orders.
- b. The exporter prepares the export package (items to be shipped), quantity, destination, destination control statement, individual to receive shipment, item's export classification, letter of assurance, commercial invoice, Certificate of Origin, Schedule B numbers, declared value of items, and makes the initial classification assessment.
- c. The CEA and CEC review the complete export package to determine if a license is required utilizing the Export Processing Template in the NASA Export Control Program document. CEA makes a copy and places it in his/her record of export activity.
- d. If the CEA determines that an export license is required, the exporter will gather the required information and prepares the export license request package. CEA will provide support as needed.
- e. The CEA prepares a transmittal letter to the HEA at NASA Headquarters and sends the export license request package to NASA Headquarters External Relations Office.
- f. The HEA prepares the transmittal letter for submittal of the package to the Department of Commerce for EAR licenses or the Department of State for ITAR licenses and submits the package. (Per NASA Headquarters OI - HOWI 2190-1011)
- g. The Department of Commerce for EAR Licenses or the Department of State for ITAR licenses reviews the request and determines if a license will be granted.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 17 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

- h. If a license is granted, the HEA forwards a copy to the CEA. The CEA notifies the exporter that the license has been granted and provides a copy of the license. The CEA files a copy with the NF 1676.
- i. The exporter prepares commercial invoice, license determination memos, and combines with the export package data. A copy of these items is retained with the NF 1676 for record keeping purposes. The exporter provides information to the Center shipping and receiving representative for the preparation of shipping request, DD Form 1149.
- j. If a license is not granted, **DO NOT SHIP THE ITEM!**
- k. If the CEA determines a license is not required, the CEA prepares and signs an export letter for shipping and sends it to the exporter for inclusion in the export package. The CEA files a copy of the letter and the NF 1676.
- l. The exporter provides the item to be shipped and all required documentation to the shipping office. The exporter is responsible for assisting in the development of the appropriate shipping forms such as the DD Form 1149, Shipper's Export Declaration Form 7525-V (if applicable), schedule B codes, Commercial Invoice, Certificate of Origin. The exporter may also be required to assist in the processing of a Power-of-Attorney form that designates a forwarding agent.

### **3.2.5 Export via U.S. Mail, Fax, E-mail, Hand-carry, or Foreign Travel**

This section discusses the activities associated with scientific or technical information exports via U.S. mail, fax, e-mail, hand-carry, or foreign travel.

- a. The exporter prepares form NF 1676.
- b. The exporter sends the form to the Technology Transfer Officer for review and approval.
- c. The TTO sends the document approved or disapproved to the CEA for review.
- d. If the CEA concurs with the request, the CEA sends the NF 1676 to the STI/DAA Office for approval. Upon approval/disapproval, the STI/DAA returns the document to the CEA for placement in his/her record of export activity. The CEA files the original NF 1676 and a copy of the document. A copy of the NF 1676 and the original document is returned to the exporter. The exporter proceeds with the export.
- e. The NF 1676 is sent with the NF 1167 to NASA Headquarters for review by Code ID.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 18 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

### 3.2.6 Internet/Web Page

This section discusses the export related activities associated with the SSC web site registration process.

- a. The SSC Web Site Registration form, SSC-707, must be completed and approved prior to a new SSC Web site being made available on the Internet.
- b. The CEA reviews SSC-707 to assure that the responsible NASA official is made aware of their export control responsibilities in accordance with U.S. export laws and regulations. If the requestor determines that the Web site will contain export control data, the requestor will initiate a NF 1676 and process it accordingly. The CEA makes a copy and places it in the record of export activity.
- c. CEA forwards the request to the Security Office, and Public Affairs Office for review and approval, and finally to the SSC Webmaster for acceptance.

### 3.3 Training

The Training function shall consist of the activities associated with assuring that all SSC NASA and NASA contractor personnel receive appropriate export control training to become responsible exporters. Training may consist of Agency and/or SSC tailored, Department of Commerce, and Department of State programs. These programs are designed to raise personal awareness and provide guidance in getting assistance when help is needed. The development of the export control training plan for NASA personnel is the responsibility of the CEA. Training records are retained in a central file by the CEA.

Training focuses on what export control is; why it's important; penalties for non-compliance; organizational responsibilities; documentation responsibilities; where to go for help.

The NASA Headquarters HEA has developed a computer based export control training program which is available for all NASA employees through the NASA site for online learning and resources (SOLAR). It is essential that all employees avail themselves of this opportunity for export training. This type of training can be accomplished at a leisurely pace, with a flexible schedule, and from the employee's desktop.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	Number	Rev.
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Page 19 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

### 3.4 Foreign Travel

#### 3.4.1 Trips Abroad

The SSC Travel Office notifies the Center Export Administrator of all business related trips out of the United States made by SSC employees.

Employees planning a business trip to a foreign destination should coordinate with their CEA to ensure that any technical data that may be disclosed or transferred during business meetings is properly authorized for export.

In accordance with NPD 9710.1, *Delegation of Authority – To Authorize or Approve Temporary Duty Travel on Official Business and Related Matters*, all employees must coordinate their foreign temporary duty travel with the NASA Headquarters Office of External Relations. This is accomplished by submitting for approval NF 1167, *Request for Approval of Foreign Training and Non Program Travel or Participation in Domestic Outside Symposia*. A Headquarters approved copy of this form is to be sent to the CEA by the SSC Finance Office for file.

In addition, if the employee intends to hand carry technical data and/or commodities, they should coordinate these with their CEA for the appropriate procedures. Commodities controlled for export purposes by the Department of State may not be hand carried internationally. These items must be shipped commercially in advance of your personal departure. Classified material may not be hand carried at any time.

#### 3.4.2 Travel Tips

- a. All exports of hardware and technical data require some type of export authorization.
- b. Know import laws and regulations of the country that you are visiting.
- c. Know your customer - be vigilant of re-exports to prohibited individuals/countries.
- d. Do not discuss, disclose, or transfer technical data to any non-U.S. person or entity without proper export authorization.
- e. Do not take any unnecessary technical data with you on foreign travels. Be aware that there is always a risk of loss of or unauthorized access made to your personal possessions. This includes laptop computers.
- f. If at all possible, forward licensable technical data in advance of your trip.
- g. Check the NASA Export Program Web page that is available on the SSC Intranet for information on foreign travel advisories.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		Page 20 of 25
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

h. Check with the SSC Medical Clinic to receive the latest information on getting medical assistance abroad while on official travel. As a NASA employee, be sure to carry at all times the NASA International 24-Hour Emergency Number (SOS Worldwide Alarm Center) for medical services.

i. If hand-carrying a computer, be sure to complete the *NASA Property Pass and Removal Permit* (NF 892).

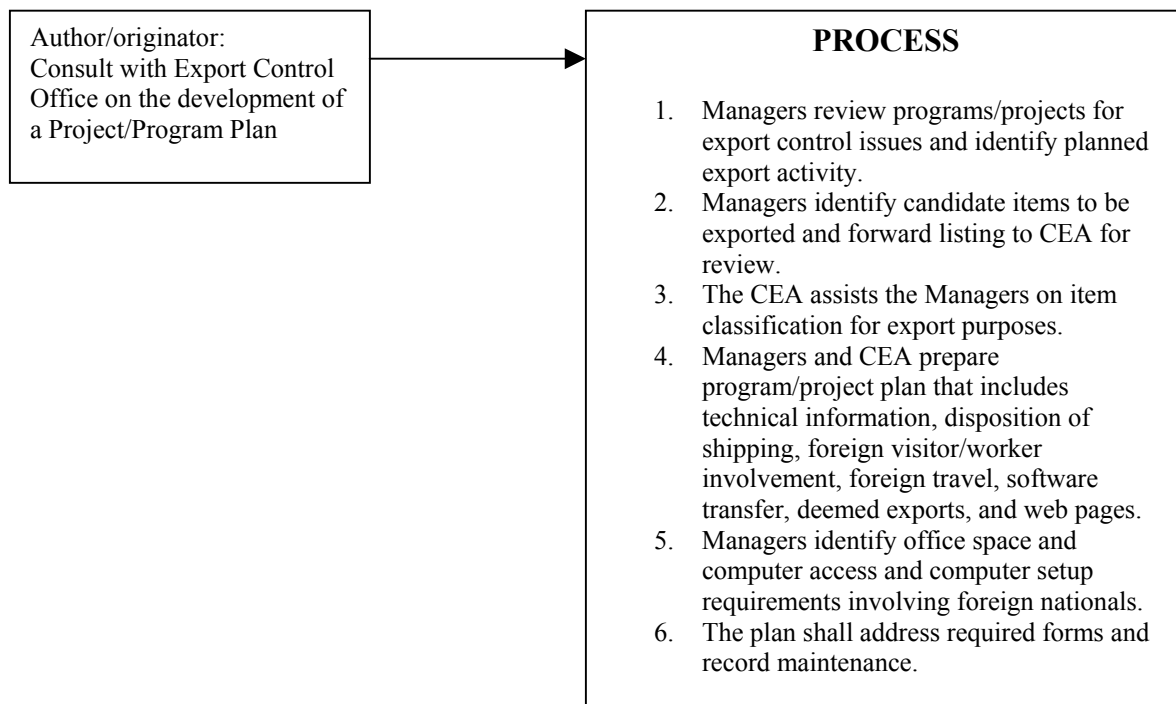
j. If you are taking any hardware out of the country you must have a method to prove property ownership or title. This may be accomplished by declaring the property prior to departing the port of exit using Customs Form 4457. The form is not available electronically but may be obtained from the port of exit Customs Office; they may/may not accept the NF 892 as proof of title.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 21 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## CHAPTER 4. ACTIVITIES PROCESS INFORMATION

### 4.1 Planning Activities Process

The following activities depict the export related processes discussed in paragraph 3.1.



Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 22 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## 4.2 Document Availability Authorization (DAA) NF 1676

The DAA activities information depicts the export related processes as discussed in paragraph 3.2.3.2. The DAA form is used in all exports of technical data/information and hardware.

### NF 1676 (DAA)

The electronic NF 1676 is available on the Stennis Intranet under Reference Documentation

- SSC Scientific & Technical Information
- SSC Export Control Program
- SSC Electronic Forms

### CONSIDERATION CRITERIA

1. Did you use the Export Program Template?
2. Is the information in the public domain?
3. Is the item basic fundamental research?
4. Is the item technical data?
5. Is the item design information?
6. Is the item a piece of software?
7. Is the item controlled by the ITAR or EAR?
8. Where will the item be sent?
9. Who will receive the item?
10. Will this item be mailed to a foreign country?
11. Is the receiver a foreign national?
12. Is the transfer part of an international agreement, contract, or grant?
13. Is the person/company end user on the EAR /ITAR Denied Parties List or the Specially Designated National List?
14. If hardware shipping is involved, did you coordinate with the Center Transportation Officer?

### NF 1676 PROCESS

1. The author/exporter accesses the form on the web page.
2. The form requires a document number. The author gets an electronic number by going to the SSC Intranet, "How To." Select PNS (Publication Numbering Series). Complete each block. If there are any questions, contact the CEA.
3. The form must have the author's and a supervisor's signature.
4. The author shall assess if the technology, software, or hardware is an export controlled item and its category classification. For export determination assistance, the author should use the Export Program Template available on the SSC Intranet under "Reference Documentation," "SSC Export Control Program."
5. If the item is a software program planned for release, the author should coordinate with the Software Release Authority or Technology Transfer Office (Same Office).
6. After supervisory signature, forward the form to the NASA Technology Transfer Office for signature.
7. The Technology Transfer Office shall forward the form to the SSC Center Export Administrator (CEA).
8. The CEA shall forward the form to the Document Availability Authorization authority for signature.
9. The CEA shall retain the original NF 1676 and a copy of the attachment for record file retention and return a copy of the NF 1676 and attachment original to the author.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		Page 23 of 25
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

### 4.3 Shipping Hardware

The shipping activities information process depicts the export related steps required to properly ship items to foreign entities as discussed in paragraph 3.2.4.

**ATTENTION: If a license is required to export an item, there is a six-month process time. Complete all forms and submit to CEA for processing early.**

#### Required Documents

NF 1676  
DD 1149  
Bureau of Census 7525-V  
Schedule B Numbers  
Commercial Invoice Form  
Certificate of Origin  
Power of Attorney

#### PROCESS

1. The exporter downloads and completes NF 1676. A complete listing of all equipment and functional description is required. The exporter compares the equipment functional description with the ITAR and EAR to determine category and classification to assess the need for an export license, license exemption, or license exception for each piece of hardware or technical manual/technical information to be exported.
2. The exporter completes DD Form 1149 that details the item nomenclature, item value, and shipping and receiving information with the Transportation Officer's signature.
3. The exporter completes the Shippers Export Declaration, Bureau of Census 7525-V, which includes items shipped, values, Schedule B codes, Government license authority and CEA signature.
4. If a license is required, all forms are submitted to the CEA for transmittal to NASA Headquarters, HEA Code ID for processing for any appropriate licenses. The exporter cannot ship any item until a license authority is obtained.
5. The exporter must determine the method of transportation for the export of the item, via air or sea transport. It is important to contact the SSC Transportation Officer for assistance and authority to transport any Government property off the Stennis Space Center.
6. The exporter will require a Certificate of Origin and a Commercial Invoice Form. The vendor shipping organization can assist with these forms.
7. The shipping organization will require a Power of Attorney to perform services in the Government's behalf. The SSC Legal Office can provide this document.
8. A copy of all documents must be maintained and provided to the CEA for retention for 5 years.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date: September 20, 2002	
	Expiration Date: September 20, 2007	
Page 24 of 25		
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

## CHAPTER 5. RECORDS

### 5.1 Export Records

Record keeping is an important aspect of the export process. Both the Export Administration Regulations (EAR) and the International Traffic in Arms Regulation (ITAR) require that export related documentation be retained for at least five (5) years after the last activity associated with an export has been completed. The record keeping requirements apply to all types of export activity not just licenses. For example, documentation related to license exceptions and exemptions should also be retained.

Quality Records must be retained as follows:

Quality Record	Repository	Period of Time
Record of Annual CEA, Management, and General Training;	Maintained by: CEA	Retain 5 Years from the completion date of the activity or as needed
Document Availability Authorization NF 1676 and attachment(s) (Document/supporting documentation)	Maintained by: CEA	Retain 5 Years from the completion date of the activity or as needed
Annual Export Control Program Audit Report;	Maintained by: CEA	Retain 5 Years from the completion date of the activity or as needed

Record retention responsibilities of the CEA include records of export activity, export licensing data, License Exception and Exemption Data, NF 1676, SSC-707 (Web site registration), shipping records (DD Form 1149). Only one complete record set must be maintained for 5 years as coordinated by the CEA.

Stennis Procedures and Guidelines	SPG 2190.1	Basic
	<i>Number</i>	<i>Rev.</i>
	Effective Date:	September 20, 2002
	Expiration Date:	September 20, 2007
Responsible Office: Center Operations and Support Directorate/SSC Export Administration		Page 25 of 25
<b>SUBJECT: Export Control Program Procedures and Guidelines</b>		

The most important principle to apply in deciding what records to keep is to answer the following questions:

1. Do my records clearly identify the items exported, the export activity, and documentation that supports the export decisions made regarding the export?
2. Can someone review the records and understand what happened?

## 5.2 Examples of Records Retained

The following is a list of the types of information that should be retained. (This list is not exhaustive and good judgment should be used in deciding what other records are needed to document the export activity.)

- a. Export licenses
- b. Export license applications
- c. All documentation submitted in support of an export license application
- d. NASA Scientific and Technical Document Availability Authorization (DAA – NF 1676)
- e. Records of foreign mail, facsimiles and e-mails
- f. Records of technical interchange meetings with foreign participation
- g. License exception information
- h. License exemption information
- i. Supporting memoranda, notes, and correspondence.

If records concerning an export are maintained by another organization, you may want to make a copy of the data and place it with your records or place the information by identifying the location of the records and how to access them in your files. An example of this would be shipping documentation concerning an export.